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New York State Department Of Environmental Conservation
50 Wolf Road, Albany, New York 12233-7010



John P. Cahill
Commissioner

December 1, 1997

Mr. Carlo San Giovanni
Geraghty & Miller, Inc.
88 Duryea Road
Melville, NY 11747

Dear Mr. San Giovanni:

RE: Grumman Corporation
Site Number: 1-30-003A

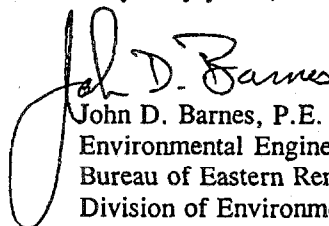
This is a follow-up to my conversation with John Ohlmann (Northrop-Grumman) of November 25, 1997, and our teleconference of November 24, 1997.

It is my understanding that Geraghty & Miller, Inc. will now be responsible for drafting the Draft Final Groundwater Feasibility Study Report and the Final Feasibility Study Report. In order to expedite the development of the Proposed Remedial Action Plan, please supply me with descriptions of the remedial alternatives and the corresponding cost estimates as this information is developed. The NYSDEC hereby requests that the Draft Final Groundwater Feasibility Study be distributed to the members of the Technical Committee by December 31, 1997.

A summary of the topics that were discussed during the teleconference of November 24th is attached. Please use the attached summary as a guide when writing the Draft Final Groundwater Feasibility Study Report. The NYSDEC requests that no statements regarding the liability of any party in this matter be incorporated into the Groundwater Feasibility Study. For example, it is acceptable to list the contaminants of concern, but specific contaminants must not be tagged to a specific party.

If you have any questions regarding this matter, please feel free to contact me at (518) 457-3395.

Very truly yours,


John D. Barnes, P.E.
Environmental Engineer 2
Bureau of Eastern Remedial Action
Division of Environmental Remediation

enc.

cc(w/enc.): S. Ervolina
S. McCormick
J. Hussey
B. Gilday (NYSDOH)
K. Lynch (USEPA)
J. Cofman (Grumman)
J. Colter (US Navy)
D. Brayack (CF Braun)
A. Weston (OCC)
T. Bradbourne (GSH)
J. Kay (CRA)
J. Molloy (H2M)

Summary of Comments to be Incorporated into the Groundwater Feasibility Study Report

I. Comments from Northrop-Grumman

The editorial comments that were suggested in the marked-up copy of the draft FS report are acceptable to the NYSDEC with the following exceptions:

1. The correct names of the three sites are (cover pages):

Grumman Aerospace - Bethpage Facility (#130003A)
Naval Weapons Industrial Reserve Plant - Bethpage (#130003B)
RUCO Polymer (Hooker Chemical) (#130004)
2. Conestoga-Rovers & Associates must not be listed as a co-author of the report (cover pages).
3. Page 1-3, first paragraph: A statement that the Industrial Waste Treatment Plant (IWTP) is no longer in use must be incorporated into this paragraph.
4. Page 1-4, first paragraph: The term 'polyols' does appear in documents pertaining to the RUCO Polymer site.
5. Page 2-31, third paragraph: The second sentence of this paragraph should read: "Over time.... contamination in groundwater *would* decrease...." (correction italicized).
6. Page 2-34, third paragraph: The mobility of the contamination in groundwater would not be altered if a landfill-type cap were installed anywhere at the sites. A landfill-type cap is a source remedy, and it might be best to delete this technology from the FS Report.
7. Page 3-17, fourth paragraph: It is the understanding of the NYSDEC that the air permit calculations will be incorporated into an appendix to the FS Report.
8. Page 4-8, first sentence: The text suggested by the NYSDOH must be inserted in place of the text presented in the draft report.

II. Comments from the Occidental Chemical Corporation

The following comments must be incorporated into the FS Report as presented by OCC or as modified below:

1. OCC General Comment #2: The issues that are presented in this comment (and other similar comments), would best be addressed (if required) after the ongoing modelling efforts are completed.
2. OCC General Comment #3: The issue presented in this comment is best addressed during the remedial design phase of this project. A statement regarding this issue must be incorporated into the FS Report.
3. OCC General Comment #4(ii): No statements regarding property values are to be incorporated into the FS Report. If these issues happen to come up during the public meeting or public comment period, then they will be addressed at that time.
4. OCC General Comment #4(v): The IRM and the VCM remedies are to be considered containment remedies.
5. OCC Specific Comments #4a and #4b: The requested text changes must be incorporated into the FS

Report.

6. OCC Specific Comment #6c: The suggested text must be incorporated into FS Report, but, it must be made clear to the reader that the conditions in an aquifer must be conducive to bioremediation in order for biodechlorination reactions to take place.
7. OCC Specific Comment #10b: The suggested text must be incorporated into the FS Report.
8. OCC Specific Comment #11a: The suggested text must be incorporated into the FS Report. NOTE: As a result, DEC Specific Comment #24 is to be disregarded.
9. OCC Specific Comment #12a: Revisions to the titles of the remedial alternatives will likely be required when writing the next draft of the FS Report.
10. OCC Specific Comment #21e(i): The first sentence of the first paragraph on Page 4-8 must be revised as follows:

“There is a potential that the VCM portion of the plume will migrate further downgradient and affect more of the Navy and Grumman production wells and the IRM wells.”
11. OCC Specific Comment #21h: The second sentence of the third paragraph on Page 4-9 (and elsewhere) must be deleted.
12. OCC Specific Comment 27c: It is my understanding that the issues presented in this comment will be addressed in Appendix B of the FS Report.

III. Comments from the United States Navy

The editorial comments that were suggested in the October 3, 1997 letter from James L. Colter are acceptable to the NYSDEC with the following exceptions:

1. Navy Comment #2, third line: Change ‘fee’ to ‘fed’ and ‘form’ to ‘from’.
2. Navy Comment #6: Delete the phrase “... as a precautionary measure in case the offsite contaminants migrate into the public supply wells”.
3. Navy Comment #9: The issue presented in this comment is currently being addressed by the modelers.

IV. Comments from the New York State Department of Health

The editorial comments that were suggested in the October 3, 1997 letter from William Gilday are acceptable to the NYSDEC with the following exceptions:

1. DOH Comment #6: It must also be noted that treatment systems have been installed and are operating at the BWD plants that are located to the south of the three sites.
2. DOH Comment #10: The drinking water standard for vinyl chloride is 2µg/l.
3. DOH Comment #12: The suggested text is to be written as follows:

“However, continued migration of the contaminant plume beyond the Bethpage Water District could potentially pose additional impacts to other downgradient water districts. Groundwater modelling

results show no current risks exist to these downgradient water supplies, and long-term groundwater monitoring would be used to evaluate and confirm the results of the groundwater modelling.”

4. DOH Comment #13. This may be disregarded for now. We will address this issue if it is raised at the public meeting or during the public comment period.
5. DOH Comment #31: This comment may be disregarded.
6. DOH Comment #34: This comment may be disregarded for now. We will address this issue if it is raised at the public meeting or during the public comment period.

Comments from the New York State Department of Environmental Conservation

1. General Comment #2: The NYSDEC will re-evaluate the need for an additional outpost well NW of Bethpage Plant #6. This issue is tabled until the remedial design phase of this project.
2. As stated above, Specific Comment #24 is retracted.